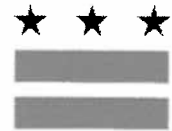




## WORKFORCE INVESTMENT COUNCIL DISTRICT OF COLUMBIA



WIC Policy No.	Subject	Date
2013.006	CO-ENROLLMENT	7/9/2013

**ISSUING ENTITY:**

DC Workforce Investment Council

**SCOPE:**

DC Workforce Investment Council, DC WIA Administrative Entity, One-Stop Operators, and Mandatory Partner Programs

**REFERENCES:**

Title I of the Workforce Investment Act (WIA) of 1998, as amended (29 U.S.C. 2801 et seq.); WIA Regulations, 20 CFR Part 652 et al, 29 CFR Part 95-97; Office of Management and Budget (OMB) cost principles codified in 2 CFR Part 220, Part 225 and Part 230; Department of Labor (DOL) Employment and Training Administration (ETA) Training and Employment Guidance Letter (TEGL) No. 17-05

**EFFECTIVE DATE:**

October 1, 2013

**OBJECTIVE:**

This policy provides instruction and guidance regarding co-enrollments across funding streams, and serves to encourage coordination and leveraging of resources among mandatory partner programs. In this policy, the DC Workforce Investment Council outlines its expectations on co-enrollment and the framework for case management, file management, and documentation requirements to support co-enrollment.

**BACKGROUND:**

WIA is designed to encourage coordination across partner agencies to help job seekers and business customers with a wide range of services. DC American Job Centers provide a single location for customers to access these services. Partners who provide services through DCAJCs have varied eligibility and participation requirements and may have unique performance outcome goals. Enrollment in more than one program at a time provides a comprehensive menu of services and activities to help an individual get and keep a job.

**CO-ENROLLMENT:**

No single partner program can be everything to every customer, so it is critical to leverage the limited resources through the use of co-enrollment. When appropriate, the DC Workforce Investment Council encourages partners to co-enroll across funding streams to leverage resources, eliminate duplication, and meet the needs and expectations of customers. Leveraging resources is not just an opportunity but an economic and social reality in the current and projected funding environment. The DC Workforce Investment Council considers co-enrollment a strategic necessity in the context of limited and diminishing resources. Co-enrollment necessitates a greater level of communication and coordination, and can involve staff from different offices and with specialties in different disciplines. Coordination of services in a customer-focused manner minimizes the possibility of subsequent reentry into the system

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in cases where needed services were not provided or possible barriers not addressed. Coordination among partners also enhances performance outcomes across individual programs and facilitates the synergy across programs that is at the heart of the workforce system.

- A. **General Population System Entry.** Wagner-Peyser is the typical point of entry for DCAJC customers. Individuals seeking workforce development services will be registered as Wagner-Peyser program participants. Once registered as Wagner-Peyser program participants, individual attention will be given to job seekers using a team based approach that focuses on the most appropriate next step. Staff from partner programs will be organized by function intended to facilitate and ensure the seamless delivery of core services as outlined in the Workforce Investment Council's Adult and Dislocated Worker Services Policy (No. 2013-004). Wagner-Peyser participants who require additional services, such as intensive services defined under WIA Section 134(d)(3) and supportive services defined in DC Workforce Investment Council's Support Services Policy 2013.007, may be co-enrolled in the WIA Adult program in addition to other Partner programs.
- B. **Dislocated Worker System Entry.** Individuals may initially present as dislocated workers. In these instances, the individual may not begin their system enrollment as a Wagner-Peyser participant, although they will be subsequently co-enrolled in Wagner-Peyser (e.g., through use of Wagner-Peyser funded technology). Eligible WIA Dislocated Workers may also be co-enrolled in the Trade Adjustment Assistance (TAA) program. If an individual is covered under a TAA petition, co-enrollment between WIA Dislocated Worker and TAA Programs is encouraged but not required. In addition, an eligible WIA Dislocated Worker may be co-enrolled in a National Emergency Grant project or in the WIA Adult program.
- C. **Youth System Entry.** WIA Youth participants may be co-enrolled in all appropriate programs that serve Youth, such as discretionary grant programs. Older youth may be co-enrolled in the WIA Adult program.

### **POINT OF PARTICIPATION:**

The District is required to track participation and performance outcomes across a range of mandatory partner programs, including WIA Adult, Dislocated Worker, and Youth programs. The requirement to track such outcomes with respect to a specific customer is triggered at the "point of participation," as defined for each program. Training and Employment Guidance Letter 17-05 gives states flexibility to determine the point of participation when an individual receives services from multiple programs, including Wagner-Peyser, WIA Adult, WIA Dislocated Worker, WIA National Emergency Grant (NEG), WIA Youth, TAA, and Veterans' Employment and Training Services (VETS).

The District is not implementing a common participation date at this time. Therefore, individuals participating in multiple programs (i.e., co-enrolled individuals) may have a different date of participation across programs.

The term "participant" is defined as an individual determined eligible to participate in a program who receives a service funded by that program. Only "qualifying" services will trigger participation in most cases, as described in "Services that Commence Participation" below. Once participants exit from a program, they will be included in performance calculations for that program. For the core workforce programs, this translates into the following:

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- A. **Wagner-Peyser**. There are no eligibility requirements for Wagner-Peyser participants. Any Wagner-Peyser-funded service will trigger participation as long as the individual registers and is identifiable in the DC management information system designated by the DC Workforce Investment Council. All registered Wagner-Peyser participants are included in Wagner-Peyser participant counts and Wagner-Peyser performance calculations.
- B. **WIA Adults**. The WIA Adult program eligibility requirements are discussed in the DC WIC Policy No. 2013-010. The date of participation for purposes of WIA participation rates is triggered when an individual is determined to be eligible and a WIA-funded qualifying service is received. Individuals who receive only core services without significant staff involvement will not be included in performance calculations as addressed in the DC Workforce Investment Council's Adult and Dislocated Worker Services Policy. Individuals who receive any WIA Adult service with significant staff involvement are included in performance calculations.
- C. **WIA Dislocated Workers**. The WIA Dislocated Worker eligibility requirements are discussed in DC WIC Policy No. 2013-010 "WIA Adult and Dislocated Worker Eligibility." The point of participation for dislocated workers is after eligibility determination and receipt of the first Dislocated Worker-funded qualifying service. Individuals who receive only core services without significant staff involvement will not be included in performance calculations as addressed in the DC Workforce Investment Council's Adult and Dislocated Worker Services Policy. The date of participation for performance purposes is the date of first qualifying service.
- D. **WIA Youth**. The WIA Youth eligibility requirements are discussed in DC WIC Policy 2013-XXX "WIA Youth Participant Eligibility Policy. The point of participation for Youth is after eligibility determination, and receipt of the first Youth activity. Unlike WIA Adult and Dislocated Worker programs, any WIA-funded Youth activity will trigger participation and require inclusion in both participation and performance reports. With the exception of the Literacy/Numeracy common measure, once these participants exit, they will be included in performance calculations. The Literacy/Numeracy common measure compares the number of youth participants who increase one or more educational functional levels with the number of youth participants who have completed a year in the program from the date of the first service PLUS the number of youth participants who exit before completing a year in the youth program.
- E. **Trade Adjustment Assistance (TAA)**. The point of participation is after eligibility determination, consistent with federal guidelines and the TAA participant eligibility requirements, and receipt of a TAA-funded service. The date of participation is the date of first qualifying service.
- F. **Veterans' Employment and Training Services (VETS)**. The point of participation is after eligibility determination, consistent with federal guidelines and the WIA Participant Eligibility Policy, and receipt of a qualifying service provided by a Local Veterans' Employment Representative (LVER) or Disabled Veterans' Outreach Program (DVOP) Specialist.

### POINT OF EXIT:

TEGL 17-05 requires a common exit date across the core workforce programs. The exit date is critical because federal common measures are based on this date.

- A. **Exit Defined.** An exit occurs when a participant has not received a service for 90 consecutive days, has no documented gap in service, and is not scheduled for future services. After the 90 days of no service, the Exit Date is applied retroactively to the last date of service.
- B. **Services that Do Not Extend Exit.** There are certain services that, in the absence of other qualifying services under a mandatory partner program, cannot extend a customer's participation period or delay program exit, including:
1. case management and follow up activities not connected to another service or activity, such as structured job search assistance or job training;
  2. income maintenance or support payments (e.g., UI, TANF); and
  3. post-employment follow-up services designed to ensure job retention, wage gains and career progress.

### **CASE MANAGEMENT, FILE MANAGEMENT, AND DOCUMENTATION REQUIREMENTS TO SUPPORT CO-ENROLLMENT:**

In a customer-focused environment that leverages limited resources, it would be most productive to have one participant file that documents eligibility and services for all programs and one employment specialist to help the participant navigate the multiple programs.

#### **A. Co-enrollment Key Parameters**

1. The majority of workforce system participants will begin with Wagner-Peyser enrollment, which may provide sufficient services without co-enrollment.
2. If additional services are needed for an eligible and suitable participant, the individual may be co-enrolled in WIA programs.
3. All WIA Adult and Dislocated Worker participants **MUST** be co-enrolled in Wagner-Peyser, but not all Wagner-Peyser participants will be co-enrolled in WIA programs.
4. Wagner-Peyser participants who are Veterans will be co-enrolled in VETS-funded programs and may subsequently be co-enrolled in WIA programs.
5. WIA Dislocated Worker participants may be co-enrolled in a WIA Adult program.
6. All National Emergency Grant participants **MUST** be co-enrolled in Wagner-Peyser and **MUST** be co-enrolled in the WIA Dislocated Worker program and may be co-enrolled in the WIA Adult program.
7. All TAA participants **MUST** be co-enrolled in Wagner-Peyser, should also be co-enrolled in the WIA Dislocated Worker program, and may be co-enrolled in the WIA Adult program.
8. WIA Youth participants who are 18 years of age or above may be co-enrolled in the WIA Adult program and may be co-enrolled in Wagner Peyser.
9. In general, participants will have one employment specialist who will serve as their primary contact. The only exception shall be participants in the Disabled Veterans'

Outreach Program (DVOP), who will have both a DVOP Specialist and a WIA employment specialist.

10. The employment specialist obtains and maintains all required information, including documentation pertaining to eligibility and documentation to support federal data validation. For DVOP participants, the WIA employment specialist working with the individual will have the flexibility to maintain their own case file if deemed appropriate.
  11. Except in the case of DVOP participants, co-enrollment in a TAA-funded program takes precedence over all programs and the case file will transfer to a TAA-funded case manager. WIA requires TAA participants be case managed by state-merit staff, which in the District is DOES staff. The TAA-funded case manager will be responsible for obtaining and maintaining documentation, which may include documentation to support data validation requirements for other co-enrolled programs such as Workforce Investment Adults and Dislocated Workers. In the event the District has vendors other than DOES, the WIA employment specialists have the flexibility to maintain their own case file if deemed appropriate.
  12. All employment specialists are required to have a practical understanding of data validation requirements and documentation across all of the DOL funded mandatory partner activities.
- A. **Case Management, File Management, and Documentation.** Staff who maintains the case file as described in the following subsections will be required to ensure all appropriate information and documentation supporting the entire service plan and service history of the individual has been obtained and can be tracked. This is intended to fulfill federal audit requirements and to support the enhanced level of coordination and case management that co-enrollment requires. Specific case management, file management, and documentation requirements are as follows:
1. **Wagner-Peyser Participants Only**
    - a. Case Management: None.
    - b. File Management: Only electronic case file; hard copy file not required.
    - c. Documentation: None. However, all services must be entered into the management information system approved by the DC Workforce Investment Council.
  2. **Wagner-Peyser Plus WIA Core Services Without Significant Staff Involvement**
    - a. Case Management: None.
    - b. File Management: Only electronic case file; hard copy file not required.
    - c. Documentation: None. However, all services must be entered into the management information system approved by the DC Workforce Investment Council.
  3. **Wagner-Peyser Plus WIA Core Services With Significant Staff Involvement**
    - a. Case Management: Minimal by WIA Adult program.
    - b. File Management: WIA employment specialist.
    - c. Documentation: WIA employment specialist responsible for basic information, including eligibility documentation and documentation needed for data

validation purposes, which consists of staff verification of date of birth and self-attested information for all other elements unless an intensive level of service is provided.

**4. Wagner-Peyser Identified as Veterans, Not Disabled**

- a. Case Management: None unless co-enrolled in WIA Adult program.
- b. File Management: Local Veterans' Employment Representative responsible for eligibility documentation (e.g., DD-214); WIA employment specialist becomes responsible for all subsequent documentation if co-enrollment occurs.
- c. Documentation: If co-enrollment occurs, WIA employment specialist is responsible for all eligibility and data validation documentation (Wagner-Peyser, VETS, WIA).

**5. Wagner-Peyser Identified as Disabled Veterans**

- a. Case Management: Disabled Veterans' Outreach Program Specialist; if WIA co-enrollment occurs, WIA employment specialist also has case management responsibility.
- b. File Management: Disabled Veterans' Outreach Program Specialist maintains case file. WIA employment specialist maintains separate case file.
- b. Documentation: Disabled Veterans' Outreach Program Specialist responsible for VETS eligibility and related data validation information. WIA employment specialist responsible for eligibility and data validation information for WIA and documentation requirements for any subsequent co-enrollments, with Trade excepted as noted below.

**6. WIA Dislocated Workers Co-Enrolled in Wagner-Peyser**

- a. Case Management: WIA Dislocated Worker program.
- b. File Management: WIA Dislocated Worker employment specialist maintains case file, even if co-enrolled subsequently in WIA Adult program.
- c. Documentation: WIA Dislocated Worker employment specialist responsible for all eligibility and data validation documentation including documentation requirements for any subsequent enrollments, with TAA excepted as noted below.

**7. National Emergency Grant**

- a. Case Management: WIA Dislocated Worker program.
- b. File Management: WIA Dislocated Worker employment specialist with TAA excepted as noted below.
- c. Documentation: WIA Dislocated Worker employment specialist responsible for all eligibility, including National Emergency Grant, and data validation documentation.

**8. Trade Adjustment Assistance**

- a. Case Management: TAA program.
- b. File Management: TAA-funded case manager, although WIA employment specialist may maintain separate case file.

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- c. Documentation: TAA-funded case manager responsible for all eligibility and data validation documentation including that necessary for additional and subsequent co-enrollments.

### 9. WIA Youth

- a. Case Management: WIA Youth program.
- b. File Management: WIA Youth employment specialist.
- c. Documentation: WIA Youth employment specialist responsible for all eligibility and data validation documentation, including for subsequent co-enrollments.

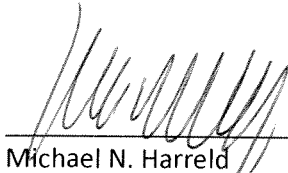
#### RESCISSIONS:

None

#### CONTACT ENTITY:

Inquiries regarding this rule should be directed to the Executive Director for the DC Workforce Investment Council.

#### APPROVAL:



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Michael N. Harreld  
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Regional President, PNC Financial Services Group